

Exhibit 1

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Complainant, Glacier Northwest, Inc.

ELECTRONICALLY
FILED
Superior Court of California,
County of San Francisco
10/19/2018
Clerk of the Court
BY: DAVID YUEN
Deputy Clerk

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN FRANCISCO

LAURA S. LEHMAN, an individual, et al.,

Plaintiffs,

v.

TRANSBAY JOINT POWERS
AUTHORITY, et al.,

Defendants.

LEAD CASE NO. CGC-16-553758

*Assigned for All Purposes to Judge
Curtis E. A. Karnow, Dept. 304*

**SUPPLEMENTAL RESPONSE OF
GLACIER NORTHWEST, INC. TO OSC
RE SANCTIONS RE INSURANCE
POLICIES**

**Hearing: October 25, 2018
Time: 9:00 a.m.
Dept.: 304**

And Related & Consolidated Cases.

*This document applies to
Millennium Tower Association, etc. v.
Mission Street Development, LLC, etc., et al.*

Action Filed: March 29, 2017
Trial Date: January 28, 2019.

1. I am a partner with the law firm of Monteleone & McCrory LLP, counsel of record for defendant, Glacier Northwest, Inc. ("Glacier"), in the above-entitled action. I provide this supplemental declaration in support of Glacier's position that it has complied with the Court's prior orders requiring the deposit of the relevant insurance policies.

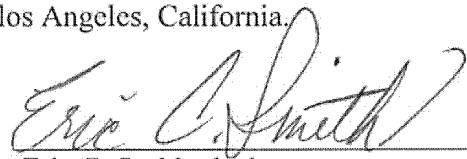
2. In addition to producing all of the relevant Glacier Policies of insurance for the years 2005-2008, the Court should be aware that the combined coverages of the listed eleven

(11) policies exceeds \$60,000,000.00, which is at least double of any damages Plaintiffs, and consequently, Cross-complainants, may conservatively ever assert against Glacier Northwest in connection with the pending litigation as to the garage water-proofing issues.

Carrier	Policy No.	Dates Effective
MSIG	GL212131702	7/1/05 - 7/1/06
Great American	TUE5-23-21-01	7/1/05 - 7/1/06
MSIG	GL2121317	7/1/06 - 10/1/06
MSIG	EXS5200086	7/1/06 - 10/1/06
AXIS	EAP704357-06	10/1/06 - 10/1/07
RSUI	NHA217297	10/1/06 - 10/1/07
RSUI	NHA217298	10/1/06 - 10/1/07
RSUI	NHA217314	10/1/06 - 10/1/07
Great American	EXC4718950	10/1/06 - 10/1/07
Great American	EXC9252175	10/1/06 - 10/1/07
AXIS	EAP704357-07	10/1/07 - 10/1/08

I declare under penalty of perjury of the laws of the State of California that the forgoing is true and correct.

Executed this 19th day of October, 2018 in los Angeles, California.


Eric C. Smith, declarant

PROOF OF SERVICE [1013A(3) CCP]

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 725 South Figueroa St., Suite 3200, Los Angeles, CA 90017.

On October 19, 2018 I served the foregoing document described as: **SUPPLEMENTAL RESPONSE OF GLACIER NORTHWEST, INC. TO OSC RE SANCTIONS RE INSURANCE POLICIES** on the interested parties in this action by means specified below:

☒ **VIA ELECTRONIC SERVICE:** Complying with Code of Civil Procedure § 1010.6, My electronic business address serrano@mmlawyers.com and I caused such document to be electronically served through FileAndServeXpress to the parties on the Service List maintained on the FileAndServeXpress Website for this case. The file transmission was reported as complete and a copy of the FileAndServeXpress Receipt will be maintained with the original document in our office.

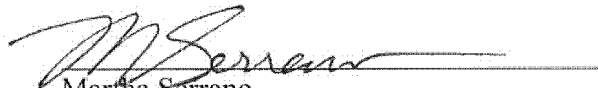
☐ **BY MAIL** – I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with first class postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing an affidavit.

☐ **BY PERSONAL SERVICE** — I delivered such envelope by hand to the person(s) named above.

☐ **BY FACSIMILE TRANSMISSION** — I transmitted said documents to the offices of the addressee(s) listed above via facsimile. The facsimile numbers are noted above.

☐ **BY ELECTRONIC DELIVERY** — I caused a copy of the original document to be transmitted to the person(s) named above *via* e-mail to the e-mail address(es) listed for such person(s), and with the consent and permission of the addressee(s) to accept service by such electronic means.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on October 19, 2018, at Los Angeles, California.


Martha Serrano